



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Ref: 8EPR-SR

August 8, 2008

Mr. Robert Medler
Project Coordinator
Remedium Group, Inc.
6401 Poplar Avenue, Suite 301
Memphis TN 38119-4840

Re: Phase IIC Sampling and Analysis Plan,
Libby Asbestos Superfund Site,
Operable Unit 3 (OU3)

Dear Bob:

As a result of discussions among the Biological Technical Assistance Group for OU3 of the Libby Asbestos Site, EPA revised the scope of the Phase II aquatic sampling program. Enclosed please find a summary table of the new scope. This will be incorporated into the final version of the **"Phase II Sampling and Analysis Plan for Operable Unit 3 (OU3), Libby Asbestos Superfund Site, Part C: Ecological Data (Phase IIC SAP)"**.

I'm sending the revised table in advance of the complete final Phase IIC SAP to assist you in your efforts to obtain the necessary permits for sampling the reference area locations. If you have any questions or need additional information, please don't hesitate to call me at (303) 312-6579.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonnie Lavelle".

Bonnie Lavelle
Remedial Project Manager
Operable Unit 3, Libby Asbestos Site

Enclosure

Table 5-2
Libby OU3 Phase IIC - Rainy Creek Watershed Ecological Sampling Summary

Station ID	Station Description	Asbestos in Sediment ¹ MF _{LA} % fine	Chromium in Sediment ¹ mg/kg	Manganese in Sediment ¹ mg/kg	Sediment Toxicity Testing	Benthic Invert. Community	Fish Population Demographics	Fish Histopath/Asbestos Tissue Burden
Rainy Creek	URC-1	Upper Rainy Creek above Mine Area	ND	6	306			
	URC-1A	Upper Rainy Creek above Mine Area 100 yards north of Rainy Creek Rd.	NS	NS	NS	√ ^a	√	√
	URC-2	Upper Rainy Creek above Mine Area	<1%	32.8	346	√ ^a	√	√
	LRC-1	Lower Rainy Creek above confluence with Carney Creek	<1%	148	299		√	√
	LRC-2	Lower Rainy Creek below confluence with Carney Creek	<1%	135	785	√ ^a	√	√
	LRC-3	Lower Rainy Creek	2%	233	798	√ ^a	√	√
	LRC-4	Lower Rainy Creek	<1%	38.8	301			
	LRC-5	Lower Rainy Creek	<1%	129	493	√ ^a	√	√
	LRC-6	Lower Rainy Creek just above confluence with the Kootenai River	<1%	126	492			
Fleetwood Creek	FC-1 ^b	Fleetwood Creek above Mine Area	ND	14.6	302	√ ^a	√	√
	FC-2	Fleetwood Creek above Tailings Impoundment	Tr	21	151		√	√
	FC-Pond	Pond on Fleetwood Creek	<1%	289	573	√ ^a		
Tailings Impoundment	TP	Tailings Impoundment	<1%	110	392			
	UTP	Upper Tailings Impoundment	NS	NS	NS			
	TP-TOE1	Toe drain of impoundment	2%	43	12,700			
	TP-TOE2	Toe drain flow to Rainy Creek below diversion	3%	213	2,470			

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	TP-Overflow	In the overflow ditch from tailings impoundment	NS	NS	NS				
Mill Pond	MP	Mill Pond	<1%	48	953				
Carney Creek	CC-1 ^b	Carney Creek	4%	77.2	263	√ ^a	√	√	
	CC-2	Carney Creek just above confluence with Rainy Creek	<1%	43.3	2,920		√	√	
	CC-Pond	Pond on lower Carney Creek	NS	NS	NS				
Reference		Reference Location (1 each in 2 stream locations)	NS	NS	NS	√ ^a	√	√	

¹ Data are from the Phase I Sampling and Analyses.

² Proposed in Phase IIA Sampling and Analyses Plan (SAP) (USEPA, 2008b)

^aSamples for testing will be collected and held with testing dependant on the results of tests using two sediment samples with high asbestos content plus a control.

^bContingent upon aquatic habitat being present.

MF = millions of fibers

LA = Libby amphibole

H = Samples will be collected and preserved and held for possible later histopathological examination.